

31/2006 17:33 FAX 212 687 5334

PAUL K. ROONEY

001/002

LAW OFFICES
PAUL K. ROONEY, P.C.
521 FIFTH AVENUE, SUITE 3900
NEW YORK, NEW YORK 10175-3399
TELEPHONE (212) 687-1980
FACSIMILE (212) 687-5334
E-MAIL PKR101@AOL.COM

PAUL K. ROONEY

ALYSSA A. FORSLUND

DEFENDANT'S
EXHIBIT

B1

January 31, 2006

VIA FAXSIMILE (212-404-4092)

Lynn Lowey, Esq.
NYU School of Medicine
Office of the Dean (Legal Dep't)
530 First Avenue
New York, NY 10016

Re: Neelu Pal, M.D.

Dear Ms. Lowey:

I would like to obtain a copy of all text messages on the Treo telephone (Verizon 917-838-8689) that Dr. Pal handed over to Annette Johnson, Esq. on January 25, 2006 (receipt enclosed). There is some personal information and telephone numbers that she needs to access. Also, I would like to review the text messages that she had with Dr. Ren and others. Can you arrange for us to review those messages and the personal information?

Very truly yours,
Paul K. Rooney
Paul K. Rooney

cc: Neelu Pal, M.D.

CONFIDENTIAL

D 00218